

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI

NORTHLAND PARENT ASSOCIATION,)	
A Missouri nonprofit corporation,)	
)	
Plaintiff,)	
)	
v.)	Case No. 4:21-cv-00623-FJG
)	
Excelsior Springs School District #40, et al.,)	
)	
Defendants.)	

**PARTIES' JOINT MOTION FOR EXTENSION OF DEADLINES FOR RULE 26(f)
CONFERENCE, RULE 16 SCHEDULING PLAN, and RULE 26(a) DISCLOSURES**

Plaintiff and all Defendants (the "parties"), by and through the undersigned counsel, jointly move the Court for an extension of the deadlines under Fed. R. Civ. P. 16 & 26 and Local Rules 16.1 and 26.1 that were set by this Court in its 10/18/2021 Order (doc. 51).

As grounds for this motion, the parties state:

1. As currently scheduled, the parties must conduct their conference pursuant to Fed. R. Civ. P. 26(f) and Local Rule 26.1(a) on or before **November 17, 2021**.
2. As currently scheduled, the parties must submit the proposed discovery and scheduling plan pursuant to Local Rule 16.1(d) on or before **December 1, 2021**.
3. In addition, the parties must make their Rule 26(a)(1) disclosures within 14 days after the Rule 26(f) conference.
4. On November 17, 2021, counsel for the parties met by telephone conference to conduct the Rule 26(f) conference. The parties recognized that pending before the Court are Plaintiff's *Motion for Preliminary Injunction* (doc. 40), Defendants' *Joint Motion to Dismiss all Claims* (doc. 48), and Plaintiff's *Motion for Leave to Amend Complaint* (doc. 58). The parties discussed and agreed that, in establishing a discovery and scheduling plan under Rule 16, as well as

in making their respective 26(a)(1) disclosures, it would be helpful and more efficient to have a ruling on those motions. The parties agreed therefore to ask the Court to extend the referenced deadlines to a date by which the parties are hopeful that a ruling will have been made on the pending motions or, if the Court has not ruled on the motions, the parties can then discuss whether the required deadlines can be met without the benefit of the rulings on the pending motions.

5. This extension request is made in good faith and not for the purposes of delay.

6. This is the parties' first request for an extension of the deadlines for the Rule 26(f) conference, the Rule 16 proposed discovery and scheduling plan, and the Rule 26(a) disclosures.

7. Plaintiff and all Defendants have conferred and agree to the extensions proposed below.

WHEREFORE, the parties ask the Court to extend the deadlines as follows:

- a. The parties shall reconvene and complete their conference pursuant to Fed. R. Civ. P. 26(f) and Local Rule 26.1(a) on or before **December 16, 2021**; and
- b. The parties shall submit the proposed discovery and scheduling plan pursuant to Local Rule 16.1(d) on or before **December 23, 2021**.
- c. The parties shall complete the Rule 26(a)(1) disclosures on or before **December 23, 2021**.

Jointly & Respectfully submitted,

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KANSAS CITY, MISSOURI

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CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of November, 2021, I electronically filed the above and foregoing motion with the clerk of the court by using the CM/ECF system that will send a notice of electronic filing to all counsel of record.

/s/ Kevin R. Corlew